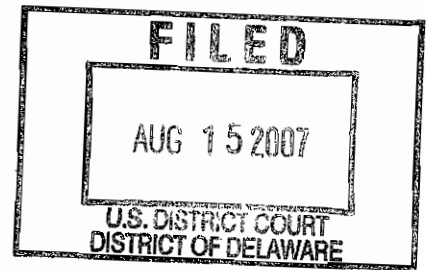


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE



RENEE M. BUTZ,

Plaintiff,

V.

LAWNS UNLIMITED LTD. and
EDWARD FLEMING,

Defendants.

Civ. No. 05-495-JJF
Judge Joseph J. Farnan Jr.

**PLAINTIFF'S RESPONSE TO DEFENDANTS' SECOND SET OF
INTERROGATORIES DIRECTED TO PLAINTIFF**

General Responses and Objections


1. Plaintiff objects to any and all Interrogatories to the extent they seek the disclosure of information or documents protected by the attorney-client privilege and/or work product privilege.
2. Plaintiff objects to any and all Interrogatories to the extent they seek information not relevant to the subject matter of this action and information not reasonably calculated to lead to the discovery of admissible evidence.
3. Plaintiff objects to any and all Interrogatories to the extent they require a response other than as described by FRCP 33.

Each of the responses provided below are subject to the general responses and objections outlined herein. Plaintiff reserves the right to supplement these interrogatories as additional, responsive, non-privileged information becomes available.

Specific Objections and Responses

20. Identify all payments you remitted to any health care provider or insurer, including but not limited to, Optimum Choice and Blue Cross Blue Shield, during the period of December 23, 2003 through April 22, 2004, and for each such payment, identify the amount of payment, the payee to whom payment was issued, and describe for what the payment was owed, including but not limited to, a co-pay for services, visits, or treatment by a health care provider, and a premium paid to an insurer.

RESPONSE: Plaintiff has previously provided the information requested through Initial Disclosure and through a Settlement offer.


Renee M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 8/13/07

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

Plaintiff,

v.

LAWNS UNLIMITED LTD. and
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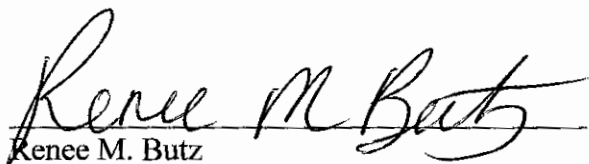
Defendants.

Civ. No. 05-495-JJF
Judge Joseph J. Farnan Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Response To Defendants' Second Set of Interrogatories were sent by first-class United States mail, postage duly paid, on this 13th day of August, 2007, to counsel of record as follows:

Margaret M. DiBianca
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building, 17th Floor
100 West Street
Wilmington, DE 19801


Renee M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 8/13/07